



May 12, 2025

The Honorable Jeannette A. Vargas
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Briskin v. City of New York et al.*, No. 24 Civ. 03557-JAV

Dear Judge Vargas:

We represent Plaintiffs Corey Briskin and Nicholas Maggipinto in this matter. The parties write jointly to provide a mediation status update in accordance with your Honor's April 11, 2025 Order. The parties remain optimistic about mediation, but believe it would be premature at this time.

The parties agree that further class discovery is necessary to engage in a productive mediation. The parties have a pending dispute regarding the scope of class discovery, and, more broadly, much of the information necessary to determine the scope of the class is not kept by Defendants, but rather by third-party insurance companies. Plaintiffs have outstanding subpoenas to three of those companies that are due by the end of the month, and Defendants will provide contact information for additional insurance companies pursuant to its May 7, 2025, letter in response to Plaintiff's discovery motion, *see* ECF No 29, and Plaintiffs will serve subpoenas in turn. Plaintiffs suspect there will be some negotiations regarding the scope of those productions and the parties will need time to assess that information once it is provided. The parties are hopeful that they will have completed the majority of class discovery and will be prepared to have a productive mediation by the fall.

Sincerely,

/s/ Peter Romer-Friedman
/s/ David Berman

Peter Romer-Friedman
Patrick David Lopez
David Berman

Attorneys for Plaintiffs

/s/ Shemori S. Corinthian

Shemori Corinthian
Assistant Corporation Counsel

Attorney for Defendants